

ANGEL CORONA FELIPE RODRIGUEZ - VOLUME 1
December 15, 2010

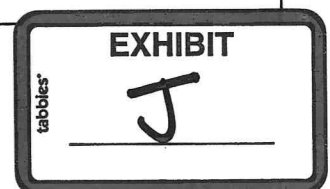
CIVIL DISTRICT COURT
 PARISH OF EAST BATON ROUGE
 STATE OF LOUISIANA

MARIA CRUZ MALDONADO,
 INDIVIDUALLY and as
 Representative of the
 Estate of ULVALDO SOTO
 MARTINEZ, DECEASED, and
 as Next Friend and Natural Guardian
 of JUSTIN SOTO-MALDONADO and
 USVALDO SOTO-MALDONADO, Minors;
 and GILBERTO SOTO MARTINEZ

VERSUS

NO. C582189
 DIV. D

KIEWIT LOUISIANA CO.,
 MASSMAN CONSTRUCTION CO.,
 TRAYLOR BROS., INC., A
 JOINT VENTURE d/b/a KIEWIT
 MASSMAN TRAYLOR CONSTRUCTORS
 a/k/a KMTC JV, GEC LOUISIANA
 TIMED MANAGERS, A JOINT VENTURE
 PARTNERSHIP, PB AMERICAS, INC.,
 f/k/a PARSONS, BRINCKERHOFF,
 QUADE & DOUGLAS, INC., AS
 PARTNER OF GEC LOUISIANA
 TIMED MANAGERS, A JOINT VENTURE
 PARTNERSHIP, LPA GROUP, INCORPORATED,
 AS PARTNER OF GEC LOUISIANA
 TIMED MANAGERS, A JOINT VENTURE
 PARTNERSHIP, ZURICH AMERICAN
 INSURANCE COMPANY, THE STATE OF
 LOUISIANA THROUGH THE DEPARTMENT
 OF TRANSPORTATION AND DEVELOPMENT,
 AND JL STEEL REINFORCING, LLC
 - CROSS NOTICED WITH -



1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
2 HOUSTON DIVISION

GUADALUPE ARENAS VARGAS,
4 INDIVIDUALLY AND AS
REPRESENTATIVE OF THE ESTATE
5 OF MARTIN ANASTACIO REYES
OSUNA, DECEASED, AND AS NEXT
6 FRIEND OF ZAID MARTIN REYES
ARENAS; JUANA SYLVIA OZUNA GARCIA;
7 and MARTIN REYES ADAME

8 CIVIL ACTION
VERSUS NO. 4:09-CV-02521

10 KIEWIT LOUISIANA CO.,
MASSMAN CONSTRUCTION CO.,
and TRAYLOR BROS, INC.,
11 a Joint Venture d/b/a KIEWIT
MASSMAN TRAYLOR CONSTRUCTORS;
12 KIEWIT LOUISIANA CO; MASSMAN
CONSTRUCTION CO.; and
13 TRAYLOR BROS, INC.

VIDEOTAPED DEPOSITION OF ANGEL FELIPE
15 CORONA RODRIGUEZ, 605 MASTERSON PASS,
APARTMENT 227, AUSTIN, TEXAS 78753, TAKEN
16 IN THE OFFICES OF TAGGART, MORTON, LLC, 1100
POYDRAS STREET, THE ENERGY CENTRE, SUITE
17 2100, NEW ORLEANS, LOUISIANA 70163, ON THE
15TH DAY OF DECEMBER, 2010.

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9

(ATTORNEYS FOR KIEWIT MASSMAN TRAYLOR
 10 CONSTRUCTORS JOINT VENTURE)

11

REPORTED BY:

12

CATHY RENEE' POWELL
 13 CERTIFIED SHORTHAND REPORTER

14 VIDEOGRAPHER:

15 GILLEY DELORMIER

16 INTERPRETER:

17 BLANCA MEJIA

18 ALSO PRESENT:

19 MIKE LaPOINTE
 JL STEEL REINFORCING, LLC

20 * * *

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1 THE VIDEOGRAPHER:

2 This is the videotaped deposition
3 of Angel Corona. This deposition is being
4 held at 1100 Poydras Street in New Orleans,
5 Louisiana, on December 15, 2010; the time is
6 10:40 a.m.

7 Would counsel please introduce
8 themselves and which party they represent.

9 MR. LYON:

10 Bob Lyon here for the plaintiff
11 Gilberto Soto Martinez.

12 MR. HERNANDEZ:

13 Juan Hernandez for the remaining
14 plaintiffs.

15 MR. JOHNS:

16 Chris Johns for plaintiffs in the
17 federal matter.

18 MR. CLAYTON:

19 Chuck Clayton on behalf of Kiewit
20 Massman Traylor Constructors Joint Venture
21 in both cases.

22 MR. HOEFER:

23 Bruce Hoefer, Louisiana Department
24 of Transportation.

25 MR. BRENNAN:

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1 Q. Yes.

2 A. We were preparing to erect a
3 column.

4 Q. What did you do that day to
5 prepare to erect a column?

6 A. I don't understand.

7 Q. On June 12, what time would you
8 get to work that day?

9 A. 7 a.m.

10 Q. When you arrived on the job site
11 at 7 a.m., what did you do?

12 A. Prepared to erect the column.

13 Q. Who were the members of your crew
14 with JL Steel that day?

15 THE INTERPRETER:

16 I need to clarify.

17 (Conversation between the interpreter
18 and the witness.)

19 THE WITNESS:

20 I put some persons to work on
21 another project.

22 EXAMINATION BY MR. LYON:

23 Q. Was it the same bridge project?

24 A. Yes.

25 Q. And how many people were members

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1 of your crew that morning?

2 A. About eight. Eight or nine
3 people.

4 Q. And did you assign all of these
5 eight or nine people to work at another
6 location that morning?

7 A. No. Half.

8 Q. And on the eastbound bridge, the
9 W2 section where the column was being
10 erected, who did you keep there that
11 morning?

12 A. As I remember, there were three or
13 four people.

14 Q. Now, can you name those people?

15 A. The two that now are dead people,
16 Martin and Usvaldo.

17 There might be another person but
18 I can't remember his name. As a matter of
19 fact, I'm not sure whether there was another
20 guy or there were only the three of us. The
21 four of us.

22 Q. Was Martin Reyes a member of the
23 crew?

24 A. Yes.

25 Q. And did he remain at the site

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1 where these two men died?

2 A. Yes.

3 Q. Now, did you stay with these four
4 men throughout the day and before the rebar
5 collapsed?

6 A. In the morning, those three and I
7 worked, and I believe my brother helped.

8 Q. Which brother?

9 A. Caesar Corona.

10 Q. And you mentioned these three men
11 worked in the morning, but we had four; we
12 had Ulvaldo, Martin, Samuel, Martin.

13 THE INTERPRETER:

14 What Martin?

15 MR. LYON:

16 Martin Reyes.

17 THE INTERPRETER:

18 Another Martin?

19 MR. BRENNAN:

20 You said Martin twice.

21 MR. LYON:

22 Yes, I did. I apologize.

23 EXAMINATION BY MR. LYON:

24 Q. So we had three folks, and then
25 yourself and your brother?

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1 A. Yes.

2 Q. What did you do that morning?

3 A. Prepared the base.

4 THE INTERPRETER:

5 I don't know. The column? He
6 said the word; I'm sorry.

7 THE WITNESS:

8 Rebar cage.

9 (Discussion off the record.)

10 THE WITNESS:

11 Prepared the cage and installed
12 the pipes in it.

13 EXAMINATION BY MR. LYON:

14 Q. Did anybody from Kiewit tell you
15 how to prepare the rebar cage and install
16 the pipes in it that morning?

17 A. No.

18 Q. Now, at some time during the day,
19 was the rebar cage raised off the ground and
20 lifted into the air?

21 A. Yes.

22 Q. Tell me how the rebar cage was
23 prepared to be lifted.

24 A. First, we put the pipes in the
25 place where we were going to lift it. Then

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1 Q. What did Felipe say?

2 A. He said, "I'm going to call Mike
3 and Jeff and we'll be there in a minute.
4 We'll be there soon."

5 Q. And, again, Mike is the Mike who
6 is sitting here with us today?

7 A. Yes.

8 Q. And who is Jeff?

9 A. Another boss.

10 Q. And so at some point in time then,
11 do Mike and Jeff arrive?

12 A. Excuse me?

13 Q. At some point in time after this
14 phone call, then, did Mike and/or Jeff
15 arrive on the scene?

16 A. At the job?

17 Q. Correct?

18 A. Yes.

19 Q. Do you think that man's name might
20 have been Jeff Meyers? If you are not sure,
21 that's fine.

22 So what did you do out there the
23 rest of the day after Jeff and Mike arrived?

24 A. I called my wife and I called
25 Martin's girlfriend. They were staying with

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1 me. Martin Reyes. I called Martin Reyes'
2 girlfriend.

3 Q. During the course of the day,
4 after you saw Gilberto hugging his brother,
5 did you see him at various points throughout
6 the afternoon and into the evening?

7 A. I don't understand.

8 Q. Okay. From the point in time when
9 you said you saw Gilberto holding his
10 brother until I think you said you were
11 there until 2 or 3 in the morning, did you
12 have the opportunity to see Gilberto again?

13 A. Get together with Gilberto?

14 Q. Not necessarily get together, but
15 just be able to see him?

16 A. Yeah, from what I can remember, he
17 was there for like two hours or three.
18 Until they took the body.

19 Q. Can you tell us what his emotional
20 state was that you observed during that
21 time?

22 MR. SWICK:

23 Object to the form of the
24 question.

25 THE WITNESS:

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REPORTER'S CERTIFICATE

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I, Cathy Renee' Powell, Certified
Court Reporter, do hereby certify that the
above-named witness, after having been first
duly sworn by me to testify to the truth,
did testify as hereinabove set forth;

That the testimony was reported by me
in shorthand and transcribed under my
personal direction and supervision, and is a
true and correct transcript, to the best of
my ability and understanding;

That I am not of counsel, not related
to counsel or parties hereto, and not in any
way interested in the outcome of this
matter.

Cathy Renee Powell

CATHY RENEE' POWELL, CCR
Certified Court Reporter